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The Honorable Nicholas G. Garaufis United States District Court 225 Cadman Plaza E Brooklyn, New York

Re: Batalla Vidal, et al. v. Nielsen, et al., Case No. 16-cv-04756

Dear Judge Garaufis

In accordance with Local Rule 1.4, I am writing to inform the Court that I seek to withdraw my appearance on behalf of New York University - amicus curiae due to my departure from Proskauer Rose LLP (counsel for New York University - amicus curiae). New York University - amicus curiae will continue to be represented by Steven E. Obus for Proskauer Rose LLP whose appearance is on file with the Court.

Thank you for your consideration.

Respectfully submitted,

Shiloh A. Rainwater